



**RESPONSE UNDER 37 C.F.R. 1.116
EXPEDITED PROCEDURE
EXAMINING GROUP 2137**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

Applicants: Botz et al.

Confirmation No.: 4349

Serial No.: 10/099,799

Group Art Unit: 2137


Filed: 03/15/2002

Examiner: David J. Pearson

Title: AUTHENTICATED IDENTITY TRANSLATION WITHIN A MULTIPLE
COMPUTING UNIT ENVIRONMENT

CERTIFICATE OF MAILING

I hereby certify that this correspondence is being deposited with
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Alexandria, VA 22313-1450, on April 17, 2006.


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Date of Signature: April 17, 2006.

To: Mail Stop AF
Commissioner for Patents
P.O. Box 1450
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Pre-Appeal Brief Request for Review

Dear Sir:

This paper is co-filed with a Notice of Appeal from the final rejection mailed January 17, 2006, in connection with the above-designated application. By this paper, Applicants request Pre-Appeal Brief review of the noted final rejection received for the above-identified application. No amendments are being filed with this Request.

Remarks

Applicants respectfully submit that the final Office Action, and in particular, the asserted combination of Makower et al. (U.S. Patent Application Publication 2002/0184507; hereinafter Makower) in view of Cuomo et al. (U.S. Patent Application Publication 2002/0091757; hereinafter Cuomo) fails to state a *prima facie* case of obviousness against Applicants' recited invention. Applicants respectfully submit that a *prima facie* case of obviousness is not stated in the final Office Action in connection with their independent claims for multiple reasons.

In this case, the rejection to the claims is principally presented as a repetition of applicants' claim language with specific paragraphs of Makower or Cuomo being cited. No further line of reasoning is presented by the Examiner as to why one or more aspects of applicants' invention would have been obvious in light of the teachings of the references. Therefore, applicants understand that the Office Action is alleging that the specifically cited paragraphs in Makower and Cuomo expressly or impliedly suggest their claimed invention. As explained in applicants' response to Final Office Action mailed March 16, 2006, such a conclusion is believed clearly unsupported by the teachings and suggestions of Makower and Cuomo. For example:

1. Applicants recite in part generating a translation token representative of the identification and authentication event and providing the translation token to the domain controller, *storing the translation token by the domain controller and obtaining a token reference from the domain controller, the token reference comprising an index to the stored translation token within the domain controller.* Without explanation, the Office Action simply references paragraph [0033] of Makower as allegedly teaching this aspect of applicants' recited invention. However, applicants respectfully submit that Makower [0033] fails to suggest that *a token reference* is obtained from the domain controller *which is an index to the stored translation token at the domain controller.* As such, applicants respectfully submit that the Office Action fails to state a *prima facie* case of obviousness against the independent claims presented. For a further discussion of this point, see applicants' Response to Final Office Action mailed March 16, 2006, at pages 2-5.

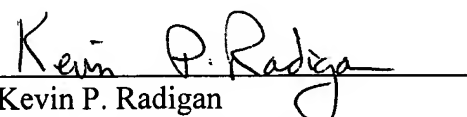
2. Applicants respectfully submit that a *prima facie* case of obviousness is not stated in the Office Action in connection with their independent claims, since each independent claim further recites *forwarding the token reference from the initial server to at least one subsequent server along with a request*. Cuomo paragraph [0009] is cited for an alleged teaching of this function. However, applicants respectfully submit that a careful reading of Cuomo fails to uncover any suggestion of a concept of forwarding a token reference (as the term is expressly defined in applicants' independent claims) from an initial server to at least one subsequent server along with a request. Since the clear language of [0009] of Cuomo does not teach or imply applicants' recited functionality, it is respectfully submitted that the Office Action fails to state a *prima facie* case of obviousness against the claims presented. For a further discussion of this point, see applicants' Response to Final Office Action mailed March 16, 2006, at pages 5-6.
3. Applicants respectfully submit that a *prima facie* case of obviousness is not stated in the Office Action in connection with their independent claims since the independent claims further recite *wherein the at least one subsequent server initiates the translating employing the token reference received from the initial server*. It appears that the Office Action at page 3, lines 17-20 is citing Makower paragraph [0030] for a teaching of this functionality. Applicants respectfully submit that a careful reading of [0030] of Makower fails to uncover any relevancy to the above-noted language of their independent claims. In the cited paragraph of Makower, the central sign-on server is attempting to recognize the client browser by determining whether a cookie exists on the client browser. This determination is simply not relevant to applicants' claimed invention. For a further discussion of this point, see applicants' Response to Final Office Action mailed March 16, 2006, at page 6.
4. Applicants respectfully submit that a *prima facie* case of obviousness is not stated in the Office Action in connection with their independent claims since the independent claims further recite *forwarding the token reference from the at least one subsequent server to the domain controller*. Again, to the extent that this function is addressed in the Office Action, paragraph [0030] of Makower is cited.

However, as noted above, this paragraph clearly does not discuss a token reference as defined in the independent claims presented, nor is there a forwarding of such a token reference from at least one subsequent server to a domain controller. As such, applicants respectfully submit that the Office Action fails to state a *prima facie* case of obviousness against the claims presented. For a further discussion of this point, see applicants' response to Final Office Action mailed March 16, 2006 at page 7.

5. Applicants respectfully submit that a *prima facie* case of obviousness is not stated in the Office Action in connection with their independent claims since the independent claims further recite *employing the token reference at the domain controller to retrieve the translation token and translate the authenticated user identity of the initial server to the local user identity of the at least one subsequent server employing the global registry of the corresponding user identity maintained by the domain controller*. The Office Action cites paragraphs [0035] & [0036] of Makower for this function. Applicants respectfully submit that a careful reading of these paragraphs fails to uncover any token reference as the term is defined in the present claims, nor the use of a token reference in Makower that would allow retrieval of a translation token that is then used to translate the authenticated user identity of the initial server to the local user identity at the at least one subsequent server employing the global registry. Although Makower does discuss mapping a client browser's user name for each server within the federation of servers, this does not teach or suggest the particular translation mechanism recited by applicants in the independent claims presented. As such, applicants respectfully submit that the Office Action fails to state a *prima facie* case of obviousness against their claims. For a further discussion of this point, see applicants' Response to Final Office Action mailed March 16, 2006 at page 7.

For the above-noted reasons, applicants respectfully submit that clear errors have been made in the Final Office Action with respect to the rejection of the subject matter recited in their claims, and as such, withdrawal of the rejection to all pending claims (i.e., claims 1, 3-6, 9-11, 13, 16-21, 23-27, 29-32, 35-37, 39, 42-47, 49-59, 62-64, 66, 69-74 & 76-79) under 35 U.S.C. §103(a) as being unpatentable over Makower in view of Cuomo is respectfully requested.

Respectfully submitted,


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